

obtain second motion vectors (MV1, MV2, MV3, MV4) for second objects (8*8)".

In addressing the presently recited "filtering" in the above rejection, section VII, pages 373-374, of de Haan et al. is being relied on. However, in page 373, right column, lines 2-9, de Haas et al. discloses:

"The block sizes commonly used in block matching are in a range that give rise to very visible artifacts...Therefore, a post operation is introduced in this section: it eliminates fixed block boundaries from the vector field without blurring contours."

Based on the above disclosure, it is evident that de Haas et al. neither teaches nor suggests the presently recited "filtering (MVPF) every occurrence of said first motion vectors (MVc, MVl, MVr, MVa, MVb) to obtain second motion vectors (MV1, MV2, MV3, MV4) for second objects (8*8)", as required by the claims. Therefore, it is respectfully submitted that this feature is distinguishable over Ng in view of de Haan et al.

It is also respectfully submitted that the presently recited "generating prediction errors in dependence on said second motion vectors only" is also neither taught nor suggested by Ng in view of de Haan et al. In addressing this feature in the above rejection, the first paragraph of section VII, of de Haan et al. is being relied on.

However, in reviewing the first paragraph of section VII of Haan et al., nothing at all in regard to "generating prediction errors" is even disclosed. Further, as described above, the rest of de Haan et al. also neither teaches nor suggests the presently recited "second motion vectors", as required by the claims. Therefore, it is respectfully submitted that this feature is also distinguishable over Ng in view of de Haan et al.

In view of the above-described distinctions, it is respectfully submitted that the invention of claims 1-9 is not obvious Ng in view of Haan et al. Therefore, it is respectfully requested that the above rejection be reconsidered and withdrawn so that the present application may proceed to issue.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) to Account No. 14-1270.

Respectfully submitted,

By *Russell Gross*
Russell Gross, Reg. 46,007
Attorney, (914) 333-9631

CERTIFICATE OF MAILING

It is hereby certified that this correspondence is being deposited with the United States Postal Service as first-class mail in an envelope addressed to:

COMMISSIONER FOR PATENTS
Washington, D.C. 20231

On *January 3, 2002*
By *Edna Lopez*